

Fred C. Hart Associates, Inc.

36956



April 9, 1986

Chief, Site Investigation and Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

Re: Millington, Great Swamp,
White Bridge Road and
New Vernon Road Sites

Attn: Nigel Robinson, Project Officer

Dear Mr. Robinson:

In response to EPA's comments, please find enclosed two copies of the second revision to the "Draft Site Operations Plan" for the Millington, Great Swamp, White Bridge Road and New Vernon Road Sites. To expedite your review, I have provided below a list of EPA comments, the corresponding page(s) on which each comment is addressed, and a summary of the response.

- 1) For response, see pages 2-10, 2-12 and 2-13. Maps showing the proposed groundwater monitoring well locations have been provided for the Great Swamp, White Bridge Road, and New Vernon Road Sites.
- 2) For response, see page 2-8 and 2-9. Stainless steel well casing has been specified as "316".
- 3) For response, see page 2-26. The following language has been added to Section 2.10.3:

In order to determine the full nature and extent of contamination at and emanating from the sites, soil samples for chemical analysis will be selected randomly. The number and depth of soil samples for analysis will be determined in the field through consultation with EPA staff or designated representatives.

(1006A)

ASB 001 0507



- 4) The aquatic impact assessment will be revised and sent under separate cover.
- 5) For response, see page 2-27. The bailers used to collect groundwater samples will be certified laboratory clean and dedicated to each sampling point.
- 6) For response, see page 2-29. The sampling procedure for a tap or spigot includes the removal of any aerating device to avoid loss of volatile compounds.
- 7) For response, see pg. 5-18. YWC, Inc., is a member of EPA's Contract Laboratory Program and therefore their performance audit can be obtained from EPA's Sample Management Office. Performance audit information for Princeton Testing Laboratory will be sent under separate cover.
- 8) For response, see page 2-22. A trip blank for sediments has been added to Table 2-2.
- 9) For response, see page 2-23. Where possible, sediment samples will be collected using a brass or stainless steel coring device or a coring device with a removable Teflon or glass inner liner.
- 10) For response, see Table 5-2. A note that sodium thiosulfate will be added to volatile organic samples only if residual chlorine is present has been added to Table 5-2.
- 11) For response, see page 5-14. All glassware provided to HART will be cleaned following EPA protocols.
- 12) For response, see page 5-18. The inorganic and organic data for all matrices will be validated using the protocols provided by EPA and listed on page 5-18.
- 14) For response, see page 2-6. Sampling equipment pre-cleaned in the laboratory will be wrapped in heavy gauge aluminum foil for transport to the field.
- 15) For response, see page 5-19. HART has already made provisions for performing a field system audit on their sampling personnel during the course of the remedial investigation to ensure the SOP is being followed. HART will submit a copy of the resultant report to EPA's Technical Project Officer.

Should you have any further questions regarding our response to these comments, please feel free to contact me or Frances Barker at (212) 840-3990. We are anticipating approval of this plan in the near future.



Sincerely,

FRED C. HART ASSOCIATES, INC.

Thomas J. Morahan /FBB

Thomas J. Morahan
Senior Project Manager
RI/FS Department

TJM:wsm
(A048)

cc: William Sawyer, Esq.
James Moorman, Esq.
Larry Worden, Esq.

(1006A)

ASB 001 0509